

**IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

JENNIFER PIGGOTT and SLADE)
PIGGOTT,)
Plaintiffs,)
v.) CASE NO. 2:06-cv-1158-MEF
GRAY CONSTRUCTION, INC.,)
Defendant.)

COMPLAINT ON INTERVENTION

1. This is an action to protect the interest of Hwashin America Corporation, by and through its worker's compensation carrier, the Alabama Self-Insured Worker's Compensation Fund, the real party in interest, for subrogation of worker's compensation benefits and medical benefits which have been paid and/or will be paid to or on behalf of Jennifer Piggott, a worker's compensation claimant. This claim is made pursuant to §25-5-11(a), *Code of Alabama*, 1975, as amended.

2. Plaintiff Jennifer Piggott was an employee of Hwashin America Corporation on or about October 17, 2006, the date of her injury.

3. The Alabama Self-Insured Worker's Compensation Fund is licensed to do business in the State of Alabama.

4. Plaintiff Jennifer Piggott is over the age of nineteen years.

5. The Alabama Self-Insured Worker's Compensation Fund has paid worker's compensation benefits and medical bills in excess of \$46,625.00 at the present time to Jennifer Piggott and/or her medical care providers.

6. Plaintiff Jennifer Piggott has filed this current action against alleged third-party tortfeasors.

WHEREFORE, the above premises considered, Hwashin America Corporation, by and through its worker's compensation carrier, Alabama Self-Insured Worker's Compensation Fund, demands that it be reimbursed for worker's compensation benefits (including but not limited to indemnity and medical benefits currently paid or will pay in the future) paid to or on behalf of Plaintiff Jennifer Piggott, and those benefits payable in the future to or on behalf of Jennifer Piggott from the funds recoverable or to be recovered in the underlying tort action.

Respectfully submitted on this the 22nd day of May 2007.

s/ W. Christopher Waller, Jr.
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by and through the Alabama Self-Insured
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CERTIFICATE OF SERVICE

I hereby certify that on May 22, 2007, I electronically filed the foregoing with the Clerk of the Court, using the CM/ECF system which will send notification of such filing to the following registered persons and that those persons not registered with the CM/ECF system were served by U.S. mail:

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